

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
ALEXANDRIA DIVISION**

CHRISTINA BROWN,

Plaintiff,

v.

AMAZON HEADQUARTERS LLC AKA  
AMAZON.COM, INC., and AMAZON  
LOGISTICS, INC.,

Defendants.

Civil Action No. 1:23-cv-00189

**CONSENT MOTION FOR EXTENSION OF TIME TO RESPOND TO COMPLAINT**

Pursuant to Rule 6 of the Federal Rules of Civil Procedure and Rule 7 of the Local Civil Rules of this Court, Defendants Amazon.com, Inc.<sup>1</sup> and Amazon Logistics, Inc. (“Defendants”), by and through their attorneys, submit this Consent Motion for Extension of Time to Respond to Complaint. Defendants respectfully request an extension of time until March 3, 2023 to respond to the Complaint filed by Plaintiff Christina Brown (“Plaintiff” or “Brown”).

In support of this Motion, Defendants state as follows:

1. On or about January 20, 2023, Defendants were served with a copy of the Complaint and summons that Plaintiff filed in Fairfax County Circuit Court in a lawsuit captioned as *Christina Brown v. Amazon Headquarters LLC a/k/a Amazon.com, Inc. and Amazon Logistics, Inc.*, Case No. CL-2022-17556. *See* ECF No. 1-1.

2. On February 10, 2023, Defendants removed the case to this Court on diversity-of-citizenship grounds, pursuant to 28 U.S.C. §§ 1332, 1441, and 1446. *See* ECF No. 1.

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<sup>1</sup> Plaintiff describes this defendant as Amazon Headquarters LLC aka Amazon.com, Inc. However, “Amazon Headquarters LLC” is a non-existent entity.

3. Accordingly, absent an extension of time, the deadline for Defendants to answer or otherwise respond to the Complaint would be February 17, 2023. *See* Fed. R. Civ. P. 81(c)(2)(C) (giving defendants “7 days after the notice of removal is filed” to answer or otherwise respond to Complaint).

4. However, undersigned counsel was recently retained and respectfully requests a modest extension of fourteen (14) days, *i.e.*, until March 3, 2023, to answer or otherwise respond to the Complaint. The purpose of this extension is to allow defense counsel sufficient time to more fully investigate the allegations contained in the Complaint so that they may respond to those allegations in an appropriate pleading(s).

5. Prior to filing this motion, undersigned counsel contacted Plaintiff, who is representing herself, to determine whether Plaintiff would consent to this extension request. Plaintiff kindly consented to this request, subject to the Court’s approval. *See Exhibit A.*

6. No prior requests to extend this deadline have been made, and no party will be prejudiced by this extension. Indeed, March 3, 2023 is the date on which Defendants’ answer or other responsive pleading would have been due if this matter were initially filed in this Court on February 10, 2023. *See* Fed. R. Civ. P. 12(a)(1)(A) (giving parties “21 days after being served with the summons and complaint” to file responsive pleading). Moreover, no other deadlines in this case would be affected, as no scheduling order has yet been entered.

7. For good cause shown, Defendants respectfully request that the Court extend the deadline to file an answer or other pleading responsive to the Complaint until, and including, March 3, 2023. A proposed Order is enclosed.

Dated: February 14, 2023

/s/ Alexander P. Berg  
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*Counsel for Defendants*

**CERTIFICATE OF SERVICE**

I hereby certify that on February 14, 2023, a copy of the foregoing **CONSENT MOTION FOR EXTENSION OF TIME TO RESPOND TO COMPLAINT**, along with a proposed Order in support thereof, was filed with the Clerk of Court using the CM/ECF system, and served by U.S. Mail and E-mail on:

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*Plaintiff pro se*

/s/ Alexander P. Berg  
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